

1 **Thomas P. Riley, SBN 194706**
2 **LAW OFFICES OF THOMAS P. RILEY, P.C.**
3 **First Library Square**
4 **1114 Fremont Avenue**
5 **South Pasadena, CA 91030-3227**

6 **Tel: 626-799-9797**
7 **Fax: 626-799-9795**
8 **TPRLAW@att.net**

9 **Attorneys for Plaintiff**
10 **J & J Sports Productions, Inc.**

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**

13 **J & J SPORTS PRODUCTIONS, INC.,**

14 **Plaintiff,**

15 **vs.**

16 **DUY TRONG NGUYEN, ET AL.,**

17 **Defendants.**

18 **CASE NO. 3:11-cv-01157-SI**

19 **STIPULATION OF DISMISSAL OF**
20 **PLAINTIFF'S COMPLAINT AGAINST**
21 **DEFENDANTS DUY TRONG NGUYEN and**
22 **AU THI LE, individually and d/b/a**
23 **LIGHTHOUSE CAFÉ a/k/a LIGHTHOUSE**
24 **CAFÉ & RESTAURANT; and**
25 **LIGHTHOUSE CAFÉ, INC., an unknown**
26 **business entity d/b/a LIGHTHOUSE CAFE**
27 **a/k/a LIGHTHOUSE CAFÉ &**
28 **RESTAURANT**

18 **IT IS HEREBY STIPULATED** by and between Plaintiff J & J SPORTS PRODUCTIONS,
19 INC. and Defendants DUY TRONG NGUYEN and AU THI LE, individually and d/b/a
20 LIGHTHOUSE CAFÉ a/k/a LIGHTHOUSE CAFÉ & RESTAURANT; and LIGHTHOUSE CAFÉ,
21 INC., an unknown business entity d/b/a LIGHTHOUSE CAFE a/k/a LIGHTHOUSE CAFÉ &
22 RESTAURANT, that the above-entitled action is hereby dismissed **without prejudice** against DUY
23 TRONG NGUYEN and AU THI LE, individually and d/b/a LIGHTHOUSE CAFÉ a/k/a
24 LIGHTHOUSE CAFÉ & RESTAURANT; and LIGHTHOUSE CAFÉ, INC., an unknown business
25 entity d/b/a LIGHTHOUSE CAFE a/k/a LIGHTHOUSE CAFÉ & RESTAURANT, and subject to the
26 Court's jurisdiction to enforce the settlement agreement reached between the Parties.

27 **IT IS FURTHER STIPULATED** that provided no Party referenced above has filed a
28 motion to reopen this action by August 1, 2014, the dismissal shall be deemed to be **with prejudice**.

1 This dismissal is made pursuant to Federal Rules of Civil Procedure 41(a)(1). Each Party
2 referenced-above shall bear its own attorneys' fees and costs.

3
4
5
6 Dated: February 15, 2013



LAW OFFICES OF THOMAS P. RILEY, P.C.

By: Thomas P. Riley
Attorneys for Plaintiff
J & J SPORTS PRODUCTIONS, INC.

7
8
9
10
11 Dated: 4-1-2013



ROSCHA & ODNE, LLP

By: Nicholas Roscha
Attorneys for Defendant DUY TRONG NGUYEN and AU THI
LE, individually and d/b/a LIGHTHOUSE CAFÉ a/k/a
LIGHTHOUSE CAFÉ & RESTAURANT; and LIGHTHOUSE
CAFÉ, INC., an unknown business entity d/b/a LIGHTHOUSE
CAFÉ a/k/a LIGHTHOUSE CAFÉ & RESTAURANT

12
13
14
15
16
17
18
19
20
21
22
23 IT IS SO ORDERED:



4/23/13

Dated: _____

24
25
26 **The Honorable Susan Illston**
27 **United States District Court**
28 **Northern District of California**

PROOF OF SERVICE (SERVICE BY MAIL)

I declare that:

I am employed in the County of Los Angeles, California. I am over the age of eighteen years and not a party to the within cause; my business address is First Library Square, 1114 Fremont Avenue, South Pasadena, California 91030. I am readily familiar with this law firm's practice for collection and processing of correspondence/documents for mail in the ordinary course of business.

On February 15, 2013, I served:

STIPULATION OF DISMISSAL OF PLAINTIFF'S COMPLAINT AGAINST DEFENDANTS DUY TRONG NGUYEN and AU THI LE, individually and d/b/a LIGHTHOUSE CAFÉ a/k/a LIGHTHOUSE CAFÉ & RESTAURANT; and LIGHTHOUSE CAFÉ, INC., an unknown business entity d/b/a LIGHTHOUSE CAFE a/k/a LIGHTHOUSE CAFÉ & RESTAURANT

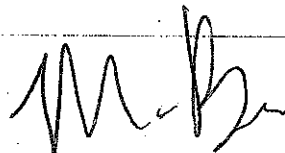
On all parties in said cause by enclosing a true copy thereof in a sealed envelope with postage prepaid and following ordinary business practices, said envelope was duly mailed and addressed to:

Mr. Nicholas Roscha, Esquire.
ROSCHA & ODNE, LLP
2300 Clayton Rd, Suite 500
Concord, CA 94520

(Attorneys for Defendants)

I declare under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct and that this declaration was executed on February 15, 2013, at South Pasadena, California.

Dated: February 15, 2013



MARIA BAIRD